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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION REGARDING
PSPS IN SUPPORT OF PG&E'S
RESPONSE TO ORDER TO SHOW
CAUSE AND FURTHER ORDER
TO SHOW CAUSE**

Judge: Hon. William Alsup

1 I, Matthew Pender, declare as follows:

2 1. I am the Director of the Community Wildfire Safety Program at Pacific
3 Gas and Electric Company ("PG&E"). In this role, I am responsible for overseeing the
4 execution of PG&E's Community Wildfire Safety Program, which includes PG&E's Public
5 Safety Power Shutoff ("PSPS") Program. I have held this position since February 2019. This
6 declaration is based on my personal knowledge and information known to me in my role as
7 Director of the Community Wildfire Safety Program.

8 PG&E's Public Safety Power Shutoff Program

9 2. PG&E implemented its PSPS program in 2018 in response to a
10 dramatically increased wildfire risk due in large part to years of drought and climate change
11 causing a longer and drier fire season and more extreme weather events. The PSPS program was
12 not the result of any failure to comply with vegetation management laws and is unrelated to tree
13 worker availability.

14 3. PG&E's Enhanced Vegetation Management ("EVM") program will not by
15 itself be a significant driver of reductions in PSPS events. The principal drivers for reducing the
16 frequency and scope of PSPS events are instead: the availability of more localized weather
17 forecasts and real-time data to more precisely determine what areas may require de-energization;
18 sectionalization of lines to allow de-energization of smaller sections of line; the use of
19 microgrids to power safe-to-energize areas within a de-energized area, and targeted system
20 hardening in high fire-risk areas.

21 4. Significantly reducing the frequency and scope of PSPS events will take a
22 number of years, but PG&E expects significant improvements each year. For example, PG&E
23 has installed more than 200 sectionalizing devices to date, allowing for a potential PSPS scope
24 reduction of approximately 138,000 customers, with more than 600 additional devices to be
25 added for a potential scope reduction of approximately 370,000 customers. PG&E estimates that
26 its transmission and distribution sectionalization and microgrid updates planned for this year
27 could reduce the impact of an event like the October 26 PSPS by approximately 30 percent.

Matthew Perde

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